

**IN THE UNITED STATE BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:

Taylor Madison Francois Bodine
aka Taylor Francois-Bodine
aka Taylor Bodine
aka Francois Bodine Consulting,

Debtor.

Case No. 21-11238-KHK

Chapter 7

**MOTION FOR AN ORDER DIRECTING TAYLOR MADISON FRANCOIS BODINE
TO PROVIDE ORAL TESTIMONY AND DOCUMENTS
PURSUANT TO RULE 2004 EXAMINATION**

John P. Fitzgerald, III, Acting United States Trustee for Region Four, by and through his undersigned counsel, moves for an Order Directing Taylor Madison Francois Bodine (the “Debtor”), to provide oral testimony pursuant to a Rule 2004 Examination for the reasons stated below:

1. The Debtor commenced this proceeding by filing a voluntary Chapter 7 petition along with her schedules, statements, on July 12, 2021 (Doc. No. 1). The Debtor signed each of the documents under penalty of perjury.
2. On August 18, 2021, Kevin R. McCarthy the chapter 7 trustee appointed in this case, conducted the meeting of creditors and issued his Report of No Distribution on August 30, 2021.
3. On October 18, 2021, the United States Trustee timely filed a Motion to Extend Deadline to File Complaint Objecting to Discharge Pursuant to Bankruptcy Rule 4004. (Doc. No. 22). A hearing is scheduled for November 9, 2021. (Doc. No. 23).

4. This Court has jurisdiction over this matter. 28 U.S.C. § 1334. This is a core proceeding. 28 U.S.C. § 157.
5. Bankruptcy Rule 2004(a) states that “[o]n motion of any party interest, the Court may order the examination of any entity.”
6. Information received by the United States Trustee leads him to believe that the Debtor may have engaged in a course of conduct such that her discharge should be denied.
7. The examination will relate only to the acts, conduct, property, or to the liabilities and financial condition of the debtor, or to any matter which may affect the administration of the debtor’s estate or the debtor’s right to discharge. The United States Trustee wants to examine the Debtor regarding this chapter 7 filing.
8. Rule 2004(c) provides for the production of documents. The United States Trustee also requests Taylor Madison Francois Bodine to produce for inspection and copying the following documents:
 - a. Signed complete copies of federal and state tax returns filed by Taylor Madison Francois Bodine for 2017, 2018, 2019, and 2020. Copies should include all attachments filed with each return.
 - b. Signed complete copies of federal and state tax returns for any entity that Taylor Madison Francois Bodine has or had an interest in for 2017, 2018, 2019, and 2020. Copies should include all attachments filed with each return.
 - c. Provide a list of all entities owned or controlled by Taylor Madison Francois Bodine or that Taylor Madison Francois Bodine has/had an interest in within the last five years. Detail Mrs. Bodine ownership interest and/or role with the entity(ies).
 - d. Provide documentation regarding the formation of any and all entity(ies) owned or controlled by Taylor Madison Francois Bodine or that Taylor Madison Francois Bodine

- has/had an interest in within the last five years, including but not limited to Maxed and Matched, Inc., Francois-Bodine Consulting, and FB Consultant, Inc. Documents should include articles of incorporation/formation, annual reports, changes of registered agent, articles of amendment and list of all officers and members, stockholder agreements, and stockholder agreement addendums.
- e. Provide complete bank statements and copies of cancelled checks for any and all bank accounts (savings and checking) that Taylor Madison Francois Bodine has or had opened; has had an interest in; or has had control of from January 2020 to October 2021. This includes bank statements for any accounts that may have been closed during that time.
 - f. Copies of any and all books and records for FB Consultant, Inc.
 - g. Copies of any and all books and records for Francois-Bodine Consulting.
 - h. Copies of any and all books and records of Maxed and Matched, Inc.
9. Wherefore, the United States Trustee moves the Court to enter an order requiring Taylor Madison Francois Bodine to appear and submit to an examination under oath pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, at the U.S. Trustee Office located at 1725 Duke Street, Suite 650, Alexandria, Virginia 22314 or by video conference, on the date and time specified in a written notice of the 2004 examination. Such examination is to be recorded by a certified court reporter.
10. The United States Trustee also moves the Court to enter an order requiring Taylor Madison Francois Bodine to produce for inspection and copying the requested documents, or file any objection to the production of those documents within 30 days of the entry of the order.

October 22, 2021

JOHN P. FITZGERALD, III
ACTING U.S. TRUSTEE, REGION 4

By: /s/ Kristen S. Eustis
Kristen S. Eustis (DC Bar No. MD28984)
Trial Attorney
Office of United States Trustee
1725 Duke Street, Suite 650
Alexandria, VA 22314
(703) 557-7227
Kristen.S.Eustis@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2021, I electronically filed the foregoing motion to extend time along with the Notice of Motion and Proposed Order with the Clerk of the Court and transmitted a true and correct copy of said documents electronically through the electronic case filing system or by first class United States mail, postage prepaid to the following:

Taylor Madison Francois Bodine
42779 Travelers Run Lane
Leesburg, VA 20176
Debtor

Robert Sergio Brandt
The Law Office of Robert S. Brandt
600 Cameron Street
Alexandria, VA 22314
Email: brandt@brandtlawfirm.com, G36549@notify.cincompass.com;lgray@brandtlawfirm.com
Counsel for Debtor

Kevin R. McCarthy
McCarthy & White, PLLC
8508 Rehoboth Ct.
Vienna, VA 22182
Email: krm@mccarthywhite.com, kmccarthy@premierremote.com;DC07@ecfcbis.com
Chapter 7 Trustee

/s/ Paula Blades
Paula Blades
Paralegal Specialist